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**HONORABLE BRIAN D. LYNCH**  
**HEARING DATE: September 13, 2018**  
**TIME: 1:30 pm**  
**RESPONSE DATE: September 6, 2018**  
**Chapter 13**  
**Tacoma, WA**

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT COURT OF WASHINGTON**

**Re**

**CLAIREASE LEANN FONTAINE**

**Debtor(s)**

**In Chapter 13 Proceeding  
No. 18-40906-BDL**

**RESPONSE TO MOTION FOR  
RELIEF FROM STAY BY AMERICA'S  
CREDIT UNION**

COMES NOW the above-referenced debtor(s) through their attorneys of record and responds as follows to the Motion for Relief from Stay by America's Credit Union as follows:

Debtor was temporarily unemployed but is now permanently employed with Boeing and the Trustee has issued the directive to her employer so payments will be received on a regular basis.

Debtor has also filed a modified Plan which will cure all arrears with America's Credit Union and which is now a 100% plan to general unsecured creditors. The loan with America's Credit Union is being paid at the contract rate and will survive the Plan.

The Modified Plan also now provides for America's Credit Union to be paid for the arrears and monthly payments before administrative expenses. Part of the delinquency to American's Credit Union is that the current confirmed Plan allows for administrative fees to be paid prior to all creditors which America's Credit Union did not object to and, therefore, should not be a reason for relief from stay to be granted. Under the modified Plan they will be paid as Rank 1.

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2 Debtor requests the Court allow the modified Plan and deny the request for relief from stay  
3 as a feasible Plan has been filed which shall cure all arrears and provide for monthly payments  
4 throughout the remainder of the Plan.

5 Dated August 22, 2018.

6 /s/ Ellen Ann Brown

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ELLEN ANN BROWN WSB#27992  
Attorneys for Debtor(s)